

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC.;
ANYTHING GOES LLC d/b/a MAIL BOXES
ETC., and JCK INDUSTRIES, INC., on
behalf of themselves and all others similarly
situated,

Plaintiffs,

vs.

PANALPINA WORLD TRANSPORT
(HOLDING) LTD., et al.,

Defendants.

Case No.: 08-CV-00042 (JG) (VVP)

**PLAINTIFFS' NOTICE OF MOTION TO
APPROVE CLASS NOTICE PROGRAM**

TO THE COURT AND TO ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs' Motion to Approve Class Notice Program will be heard before the Honorable John Gleeson, District Court Judge, on a date and at a time to be designated by the Court, at the United States District Court, 225 Cadman Plaza East, Brooklyn, New York, 11201.

Plaintiffs move the Court for entry of an order approving the class notice program proposed by Plaintiffs. In support of their Motion, Plaintiffs submit a Memorandum of Law, the Declaration of Katharine Kinsella with Exhibits 1-6, and the Declaration of Julie Redell.

Plaintiffs' Class Notice Program should be approved because it constitutes "the best notice practicable under the circumstances" Fed. R. Civ. P. 23(c)(2)(B). Plaintiffs' plan provides direct mail notice to class members from customer lists provided by Defendants. The plan exceeds the requirements of Federal Rule of Civil Procedure 23, satisfies any due process concerns, and will fairly apprise potential Settlement Class Members of the existence of the

Settlement Agreements and their options under it. This Court should approve Plaintiffs' class notice program.

Dated: July 2, 2012

Respectfully Submitted,

/s/ Steve N. Williams

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